

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK**

IN RE:

The Roman Catholic Diocese of
Ogdensburg, New York,

Debtor.

)
) Chapter 11
)
) Case No. 23-60507 (PGR)
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)
)

**SUPPLEMENTAL DECLARATION OF TIMOTHY W. BURNS IN SUPPORT OF
EX PARTE APPLICATION OF THE OFFICIAL COMMITTEE
OF UNSECURED CREDITORS TO RETAIN AND EMPLOY
BURNS BAIR LLP AS SPECIAL INSURANCE COUNSEL
EFFECTIVE AS OF SEPTEMBER 18, 2023**

I, Timothy W. Burns, declare under penalty of perjury as follows:

1. I am a partner of the law firm Burns Bair LLP (“**Burns Bair**”), proposed special insurance counsel to the Official Committee of Unsecured Creditors (the “**Committee**”) of the Roman Catholic Diocese of Ogdensburg, New York (the “**Debtor**”).

2. I submit this declaration in support of the *Ex Parte Application of the Official Committee of Unsecured Creditors to Retain and Employ Burns Bair LLP as Special Insurance Counsel Effective as of September 18, 2023* [ECF No. 210] (the “**Application**”)¹.

3. The facts set forth in this declaration are personally known to me, and, if called as a witness, I could and would competently testify thereto. To the extent any information disclosed herein requires subsequent amendment and/or modification, Burns Bair will use reasonable efforts to file a supplemental declaration reflecting such amended and/or modified information.

¹ Capitalized terms used but not defined herein shall have the meaning ascribed to them in the Application.

4. In the Application, the Committee sought to employ and retain Burns Bair as its special insurance counsel pursuant to Section 327 of the Bankruptcy Code.

5. The Application sets forth a cap of \$800 per hour for Firm professionals and \$300 an hour for Firm paraprofessionals.

6. In response to the Application, the United States Trustee requested additional information regarding the specific hourly rate for all professionals and staff that Burns Bair anticipated may work on the matter.

7. Burns Bair thereafter conferred with the United States Trustee via email and provided the United States Trustee with the following rate schedule:

Professional	Hourly Rate
Timothy Burns	\$800
Jesse Bair	\$800
Nathan Kuenzi	\$550
Brian Cawley	\$550
Karin Jonch-Clausen	\$550
Paralegals	\$300

8. In response to Burns Bair's submission of the above rate schedule, the United States Trustee informed Burns Bair that the rate schedule satisfied the United States Trustee's inquiry.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true
and correct.

Dated: Madison, Wisconsin
November 20, 2023

s/ Timothy W. Burns

Timothy W. Burns